UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON et al. Plaintiffs vs. AMERICAN FOAM CORPORATION et al. Defendants	:	C. A. No. 03-335-L

MOTION FOR ENLARGEMENT OF TIME

Now comes the Plaintiff MICHELLE SPENCE, by and through successor counsel, and moves this Honorable Court for order granting her an enlargement of time in which to file her memorandum of law in support of her objection, filed contemporaneously herewith, to the *Motion to Dismiss* filed by Defendant Foamex International, Inc.

As grounds, Plaintiff's counsel herein states he entered his appearance on June 3, 2004. Following his entry, Plaintiff's counsel filed on June 8, 2004 a *Motion to Stay Pre-trial Dispositive Motions* now pending before this Honorable Court. Plaintiff's counsel however has yet to receive the Plaintiff's file, or any of the papers contained therein, that is still in the possession of predecessor counsel despite repeated requests that it be turned over.

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A decision granting Plaintiff the requested stay will render this motion moot. Conversely, irrespective of this Court's ruling, counsel needs a reasonable opportunity to secure and review the file relating to this Plaintiff. Plaintiff therefore seeks an enlargement of time in which to file her memorandum of law in support of her objection to Defendant's Motion to Dismiss of ten (10) days following this court's ruling on Plaintiff's *Motion to Stay Pre-trial Dispositive Motions*.

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CERTIFICATION

I hereby certify that on the 11 day of June 2004 a true copy of the within was mailed to:

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